

### **INSTRUCTION NO. 33**

#### **Medical Causation**

To prevail on any of her claims in this case, Plaintiff must prove by a preponderance of the evidence that Premarin, Provera or Prempro was a cause in fact of her breast cancer and damages. This requires Plaintiff to first prove that Premarin, Provera, or Prempro is capable of causing breast cancer. In addition, Plaintiff must prove that Premarin, Provera, or Prempro was a specific cause of her breast cancer. In other words, Plaintiff must prove by a preponderance of the evidence that she would not have developed breast cancer had she not taken Premarin, Provera, or Prempro. If Plaintiff proves she had a latent, dormant, or asymptomatic pre-existing condition that became breast cancer as a result of taking Premarin, Provera, or Prempro, then you may conclude that Premarin, Provera, or Prempro caused Plaintiff's breast cancer and damages.